

## FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAFILED  
SCRANTON

OCT 04 2017

PER SP  
DEPUTY CLERK4:17cv1799  
(Case Number)(1) KYLIEFF BROWN KN 8979  
(Name of Plaintiff) (Inmate Number)1000 FOLLIES ROAD DALLAS, PA. 18612  
(Address)(2) \_\_\_\_\_  
(Name of Plaintiff) (Inmate Number)\_\_\_\_\_  
(Address)(Each named party must be numbered,  
and all names must be printed or typed)

vs.

CIVIL COMPLAINT

(1) Superintendent ~~MAHALLY~~ MAHALLY(2) Deputy ~~ZAKARAIUSKAS~~ ZAKARAIUSKAS(3) Deputy Miller  
(Names of Defendants)(Each named party must be numbered,  
and all names must be printed or typed)TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS☐ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

## I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

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ADDITIONAL DECENDANTS

- 4) MAJOR WHITE AT S.C.I. DALLAS  
1000 FOLLIES ROAD DALLAS. PA. 18612
- 5) MAJOR CERELLI AT S.C.I. DALLAS  
1000 FOLLIES ROAD DALLAS. PA. 18612
- 6) CAPTAIN MARTIN AT S.C.I. DALLAS  
1000 FOLLIES ROAD DALLAS. PA. 18612
- 7) LIEUTENANT STAROWSKI AT S.C.I. DALLAS  
1000 FOLLIES ROAD DALLAS. PA. 18612
- 8) C/O MILLER AT S.C.I. DALLAS  
1000 FOLLIES ROAD DALLAS. PA. 18612
- 9) C/O MITCHELL AT S.C.I. DALLAS  
1000 FOLLIES ROAD DALLAS. PA. 18612
- 10) COUNSELOR SULIM AT S.C.I. DALLAS  
1000 FOLLIES ROAD DALLAS. PA. 18612

P.S. THIS INSTITUTION IS NOT TRYING TO RELEASE MY PAST SIX MONTH ACCOUNT STATEMENTS SO PLEASE REACH OUT TO THIS INSTITUTION TO HAVE THEM SEND THIS LAST MY PAST SIX MONTH ACCOUNT STATEMENT I SENT IN MY ACCOUNT THE AUTHORIZATION FORM THAT YOU PROVIDED ME AND NOTHING HAS HAPPENED YET!

**II. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ☒ Yes ☐ No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ☒ Yes ☐ No
- C. If your answer to "B" is Yes:
1. What steps did you take? I FILED SEVERAL GRIEVANCES AND NONE OF MY GRIEVANCE WAS ANSWERED I'M BEING DEPRIVED OF A ANSWER TO ANY OF MY GRIEVANCES
  2. What was the result? I'M BEING IGNORED AND NOTHING THAT I FILED IN THIS JAIL GOT ANSWERED TO INCLUDING MY REQUEST SLIPS ETC...
- D. If your answer to "B" is No, explain why not: \_\_\_\_\_

**III. DEFENDANTS**

- (1) Name of first defendant: ~~XXXXXXXXXX~~ MAHAHLY
- Employed as SUPERINTENDENT at S.C.I. DALLAS  
Mailing address: 1000 ELLIOT'S ROAD DALLAS, TX 75202
- (2) Name of second defendant: ~~XXXXXXXXXX~~ ZAKARAVSKUS
- Employed as DEPUTY SUPERINTENDENT at S.C.I. DALLAS  
Mailing address: 1000 ELLIOT'S ROAD DALLAS, TX 75202
- (3) Name of third defendant: DEPUTY MILLER
- Employed as DEPUTY SUPERINTENDENT at S.C.I. DALLAS  
Mailing address: 1000 ELLIOT'S ROAD DALLAS, TX 75202

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

**IV. STATEMENT OF CLAIM**

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. I ARRIVED IN THIS INSTITUTION ON AUGUST 22, 2017 AND I TOLD DEPUTY ZAKARAVSKUS WHEN I HAD MY PRE HEARING ON AUGUST 24, 2017 WHO MY ENEMIES IN THIS JAIL WAS AND DEPUTY ZAKARAVSKUS STILL SENT ME TO POPULATION KNOWING MY SECURITY CONCERNS SO I

SPoke TO MAJOR WHITK AND MAJOR COCELLI ON 9-7-17 FACE TO FACE AND NOTHING HAPPENED

2. ON 9-21-17 I WAS ROBBED AND TIED UP BY SEVERAL INMATES THEN ASSAULTED AND THE SECURITY LT. STARRINSKEL AND CAPTAIN MARTIN IGNORED MY ISSUES AND C/O MILLER AND C/O MITCHELL APPROVED MY DEATH FOR THIS INCIDENT TO TAKE PLACE. I NOTIFIED DEPUTY MILLER AND MY COUNSELOR NOW MS. SWAN AND NOBODY DID NOTHING BUT IGNORE ME.
3. I KNOW THAT MY 8TH AMENDMENT RIGHTS ARE BEING VIOLATED HERE AT S.C.I. DALLAS DUE TO THE UNPROFESSIONAL WAY THIS JAIL IS RUN AND THE ADMINISTRATION HERE IS TRYING TO GET ME KILLED BY TELLING OTHER INMATES SO MANY BAD THINGS ABOUT ME SO MY LIFE IS IN SERIOUS DANGER HERE IN THIS JAIL.

#### V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I NEED TO BE TRANSFERRED OUT OF THIS JAIL IMMEDIATELY BEFORE I GET KILLED BY EITHER A STAFF MEMBER OR ANOTHER INMATE I'M A TARGET IN THIS JAIL AND IT SUPPOSE TO BE \$10,000 CASH ON MY HEAD FOR SOMEBODY TO KILL ME IN THIS INSTITUTION.
2. I'M BEING RETALIATED AGAINST AND CONSPIRED AGAINST BY THE STAFF HERE AT S.C.I. DALLAS AND MY 8TH AMENDMENT RIGHTS ARE BEING VIOLATED AND I HAVE PROOF OF HOW MY 8TH AMENDMENT RIGHTS ARE BEING VIOLATED. AND I WOULD LIKE TO RESOLVE THIS ISSUE IN COURT EVERY DAY REAL SOON.
3. TO TAKE THIS LIFE THREATENING ISSUE THAT I'M LIVING THROUGH TO BE TAKEN SERIOUS AND FOR THE COURTS TO TAKE THIS ISSUE SERIOUS AND PROVIDE ME WITH SOME HELP IMMEDIATELY.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30<sup>TH</sup> day of September, 20 17.

  
\_\_\_\_\_  
(Signature of Plaintiff)

KYLIEFF BROWN  
#KN 8979  
S.C.I. DALLAS  
1000 FOLLIES ROAD  
DALLAS, PA. 18012

INMATE MAIL



ZIP 18612 \$ 002.24<sup>0</sup>  
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OCT 04 2017

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DEPUTY CLERK